



Complaints Procedure

Liberum Capital Limited

January 2020

Policy Governance

Business Owner ¹	MLRO
Approved By ²	Risk & Regulatory Committee
Version No. ³	1.3
Date	13/01/2020
Next Review Date ⁴	January 2021
Related Policies and Procedures	Health & Safety Policy, Staff Handbook
Related Legislation/Regulation	FCA Handbook DISP

Document Version History⁵

Version No.	Date	Nature of Changes	Approved by
1	Jan 2014	New Policy	Risk & Regulatory Committee
1.1	November 2016	Minor Amendments	Risk & Regulatory Committee
1.2	January 2018	Minor Amendments	Risk & Regulatory Committee
1.3	January 2020	Minor Amendments	Risk & Regulatory Committee

¹ The Business Owner is responsible for:

- (i) review and update of the policy as per the review cycle or in response to regulatory developments;
- (ii) consulting with relevant stakeholders as part of the review process;
- (iii) submitting the policy to the board or relevant committee for approval with an appropriate cover paper; and
- (iv) [ensuring that the current version of the policy appears on the intranet/external website as appropriate].

A "Business Owner" can be someone in the front office or a member of middle/back office.

² All policies should be reviewed and approved by an appropriate management forum within Liberum e.g. Liberum Board, Risk and Reg Committee. Minor/clarificatory amendments do not require board/committee approval and can be made with the approval of the General Counsel (or the Compliance Officer in the case of a policy where the General Counsel is the Business Owner).

³ A new major version should be created each time the policy receives board or committee approval (e.g. 2.0). Where the amendments have been approved by the General Counsel a new minor version (e.g. 1.1) should be created.

⁴ Policies should be reviewed annually by the business owner, although this does not preclude more frequent reviews e.g. in response to regulatory changes.

⁵ Master word versions of each policy will be stored in the Policies folder maintained by Compliance.

We are committed to providing products and services of the highest standards. If you feel that we haven't lived up to your expectation in any way, we would like to know so we can put things right.

You may voice your concerns and how we could resolve the matter by contacting your business manager or the Head of Compliance using the enclosed contact details.

In the event that we receive a complaint we will retrieve all the necessary documentation relevant to your account, from our files and systems. These documents will be read and considered, in conjunction with your complaint by our Head of Compliance.

We will endeavour to respond to and resolve your complaint straight away, which we consider to be at least one business day after the day we receive your complaint. However we may need to carry out further internal investigations. In such an event within 5 working days from when we received your complaint we will acknowledge your complaint and let you know when you can expect a full response which will be no more than 4 weeks from the receipt of your complaint. We'll also let you know the name and contact details of the person or team dealing with your case.

In the unlikely event that our investigations require longer than 4 weeks to complete, we will write to you to explain why we are not yet in a position to respond to your complaint and indicate when we will make further contact (this must be within 8 weeks of the receipt of the complaint).

If after 8 weeks we are still not in a position to make a response, we will write to you and give reasons for the delay and an indication when we expect to provide a full and final response. At this point if you wish you can forward your complain to an appropriate external authority.

Once our investigations are complete we will write to you with our response, this will be either a final response or an offer letter, depending on the circumstances of your complaint.

A final Response is:

- where we believe we have fully addressed your complaint and
- notify you that you may refer the complaint to the appropriate authority if you remain dissatisfied with our final response and that you must do so within 6 months

An offer letter is:

Where we consider that you are entitled to some redress, we will include a page for you to state your acceptance and return to us. We will then forward the agreed redress in a final response letter.

We will consider a complaint closed when we have sent you our final response and

- you have indicated in writing that you accept our offer or response or
- you fail to respond to our correspondence within 8 weeks from the date of our written response.

Contact Details:

Head of Compliance
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